

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORY OF
DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-88(I-J))

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of David B. Popkin: DBP/USPS-88(i-j), filed on October 27, 1997, and redirected from the Postal Service. This response was compelled by Presiding Officer's Ruling No. R97-1/80, issued December 12, 1997.

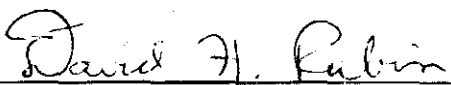
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making


David H. Rubin

475 L'Enfant Plaza West, S.W.
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(202) 268-2986; Fax -5402
December 19, 1997

**RESPONSE OF WITNESS PLUNKETT TO INTERROGATORIES OF DAVID B.
POPKIN (REDIRECTED FROM THE UNITED STATES POSTAL SERVICE)**

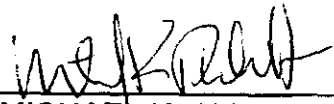
DBP/USPS-88 [i] Do you believe that the reason for the growth of Return Receipt service over the past ten years may be due in larger part to the increasing need for confirmation of delivery service by the public rather than the quality of the service? [j] If not, explain.

DBP/USPS-88 Response:

i-j. No. Absent an extensive study of customer opinions regarding return receipt, conclusions of the kind posited in this question are unwarranted. However, I do believe it is possible to make some broad inferences, as I have done by suggesting that strong volume growth despite relatively large fee increases implies that customers view the product as a good value.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

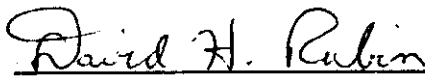


MICHAEL K. PLUNKETT

Dated: DECEMBER 17, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 19, 1997